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*Attorneys for Defendants Romeo Aranas,
Rusty Donnelly and Jonathan Perry*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CARL OLSEN,

Plaintiff,

v.

NEVADA DEPARTMENT
OF CORRECTIONS, et al.,

Defendants

Case No. 3:18-cv-00149-MMD-CLB

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
MOTION TO COMPEL DISCOVERY
(ECF NO. 43)**

Defendant, Romeo Aranas, Rusty Donnelly and Jonathan Perry, by and through counsel Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, move this Court for an extension of time to respond to Plaintiff's Motion to Compel the Production of Documents (ECF No. 43). This request is made and based on the attached points and authorities, the papers and pleadings on file herein, and such other and further information as this Court may deem appropriate.

MEMORANDUM OF POINTS AND AUTHORITIES

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to "achieve the orderly and expeditious disposition of cases." *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) "Such power is indispensable to the court's ability to enforce its orders, manage its docket, and regulate insubordinate [] conduct. *Id.* (citing *Mazzeo v. Gibbons*, No. 2:08-cv01387-RLH-PAL, 2010 WL 3910072, at *2 (D.Nev.2010)). LR IA 6-1 discusses requests for continuances. The rule states:

(a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted. (Examples: "This is the first stipulation for extension of time to file motions." "This is the third motion to extend time to take discovery.")

This is the first request, and is requested for good cause. Counsel is currently scheduled to begin a jury trial in front of District Judge Jones in the matter of *Sales v. Adamson*, Case Number 3:17-cv-00186-RCJ-WGC to begin August 24, 2021. Counsel has been preparing for that trial, and has not been able to complete the response to this motion. This trial preparation has made it difficult to research and file the response to the motion in a timely manner. Additionally, the responses to the requests have been sent to Plaintiff. (Exhibit 1 and 2). Therefore, there will be no prejudice to Plaintiff. There were additional issues in the motion that require coordination with the prison at Lovelock Correctional Center. Counsel has been unable to complete the coordination at this time. Therefore, a short extension of time is requested.

Therefore, it is requested that the Defendant have an additional 10 days to file their response to Plaintiff's motion, which would then be due on **September 2, 2021**.

DATED this 23rd day of August, 2021.

AARON D. FORD
Attorney General

By: /s/ Douglas R. Rands
DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney General

Attorneys for Defendant

IT IS SO ORDERED.

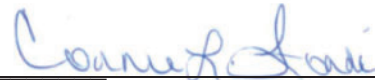
Dated: August 24, 2021


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 23rd day of August, 2021, I caused a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY (ECF NO. 42)**, to be served, by U.S. District Court CM/ECF Electronic Filing on the following:

Carl Olsen, #31147
Lovelock Correctional Center
1200 Prison Road
Lovelock, NV 89419



An employee of the Office
of the Attorney General